

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**JASON COOKSEY, HEIDI COOKSEY, AND
SARAH COOKSEY, SYDNEY COOKSEY, AND
SADIE COOKSEY, MINORS,
BY AND THROUGH THEIR NATURAL
GUARDIANS, JASON AND HEIDI COOKSEY**

PLAINTIFFS

V.

CIVIL ACTION NO. 1:18cv49LG-RHW

**HUNT SOUTHERN GROUP, LLC FKA
FOREST CITY SOUTHERN GROUP, LLC,
FOREST CITY RESIDENTIAL MANAGEMENT, LLC,
HUNT MH PROPERTY MANAGEMENT LLC,
UNKNOWN JOHN AND JANE DOES A THROUGH M,
AND OTHER UNKNOWN CORPORATE
ENTITIES N THROUGH Z**

DEFENDANTS

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND / REPLY**

Plaintiffs, by and through their attorneys of record, Rushing & Guice, P.L.L.C., file this Motion for Extension seeking additional time to respond to Defendants' Dispositive and Daubert Motions filed on May 9 and 10, 2019. By rule, the responses to these motions are presently due May 23 and 24, 2019.

1. Plaintiffs and Defendants have agreed to an extension until June 26, 2019 to respond and for replies to be extended to July 10, 2019. The extension will apply to both parties.

2. Therefore, under Local Rule 7(b)(4), Plaintiffs request this Court grant this unopposed motion to extend the time for Parties to respond to all Dispositive and Daubert motions until June 26, 2019 and for replies to responses until July 10, 2019.

3. By signature below, counsel for Plaintiffs attest that this extension is not sought for purposes of delay, but rather to allow Parties to fully respond to motions, and is therefore in the interests of the efficient administration of justice by this Court.

4. Because the relief requested is straightforward and unopposed, Plaintiffs respectfully ask to be relieved of any duty to file a separate memorandum of law.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs ask that this Court GRANT the foregoing motion, and ORDER that Plaintiffs' and Defendants' responses to Dispositive and Daubert Motions be filed no later than June 26, 2019 and replies to responses be filed no later than July 10, 2019.

This the 14th day of May 2019.

Respectfully submitted,

RUSHING & GUICE, P.L.L.C.
Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of May 2019, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the court's electronic filing system.

/s/William Lee Guice III
WILLIAM LEE GUICE III